


intent to misstate the information is documented by the applicant's own pleadings. Accordingly, the Commission can and should dismiss the Four Jacks application without a hearing based on the blatant misconduct that has occurred before its own eyes. See RKO General Inc. v. FCC, 670 F.2d 215, 231-236 (D.C. Cir. 1981), cert. denied, 456 U.S. 927 (1982).

IV. Conclusion.

For the foregoing reasons, the above-referenced application should be dismissed, or in the alternative, denied.

Respectfully submitted,

SCRIPPS HOWARD BROADCASTING COMPANY

By:   
Donald P. Zeifang  
Kenneth C. Howard Jr.  
Patricia M. Steele

BAKER & HOSTETLER  
1050 Connecticut Avenue, N.W.  
Suite 1100  
Washington, D.C. 20036

Its Attorneys

February 25, 1992

CERTIFICATE OF SERVICE

I, Cathleen Parham, a secretary in the law firm of Baker & Hostetler, do hereby certify that a copy of the foregoing Reply To Opposition To Petition To Deny Application was mailed on this 25th day of February, 1992, to the following:

Martin Leader, Esq.  
Fisher, Wayland, Cooper and Leader  
1255 Twenty-Third Street, N.W.  
Suite 800  
Washington, D.C. 20037-1125

  
Cathleen Parham

***Exhibit A***

**ENGINEERING STATEMENT  
IN RESPONSE TO THE OPPOSITION TO  
PETITION TO DENY THE APPLICATION OF  
FOUR JACKS BROADCASTING, INC.  
PREPARED ON BEHALF OF  
SCRIPPS HOWARD BROADCASTING COMPANY**

**FEBRUARY 1992**

**COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.**

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington                    )  
  ) ss  
District of Columbia                 )

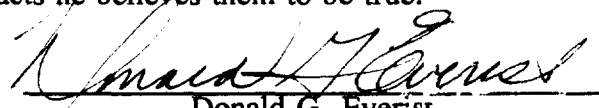
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

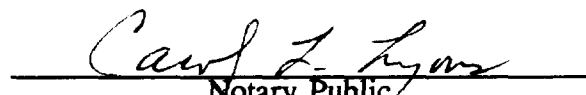
That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

  
\_\_\_\_\_  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 24<sup>th</sup> day of February, 1992.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 2/28/93

This engineering statement has been prepared on behalf of Scripps Howard Broadcasting Company ("Scripps"), licensee of WMAR-TV, Baltimore, Maryland and is in response to the Opposition to Petition to Deny the application of Four Jacks Broadcasting, Inc. ("FJB"). In its opposition to the Petition to Deny, FJB takes issue with several items -- Protection to Monitoring Station and FCC Form 301 V-C, Question 14. Further comments are directed towards FJB use of a single transmission line under the heading "Other".

Item One - **Protection to Monitoring Station** - FJB concedes that its proposal will produce 7 dB greater field strength at the Laurel Monitoring Facility than the present WMAR-TV facility. However, FJB does not indicate how it arrives at this figure and how the proposed facility will not impact upon the Laurel Monitoring Facility other than to claim that there will be no impact. It produces no calculations to substantiate its claim, therefore, it has not adequately demonstrated compliance with Section 73.1030 of the FCC Rules. Abstracted is the pertinent provisions of Section 73.1030 applicable to the FJB proposal.

"(c)     *Protection for Federal Communications Commission monitoring stations*

- (1)     Applicants in the vicinity of a FCC monitoring station for a radio station authorization to operate new transmitting facilities or changed transmitting facilities which would increase the field strength produced over the monitoring station in excess of that previously authorized *are advised to give consideration, prior to filing applications, to the possible need to protect the FCC stations from*

*harmful interference. Geographical coordinates of the facilities which require protection are listed in §0.121(c) of the FCC Rules. Applications for stations (except mobile stations) which will produce on any frequency a direct wave fundamental field strength of greater than 10 mV/m in the authorized bandwidth of service (-65.8 dBW/m<sup>2</sup> power flux density assuming a free space characteristic impedance of  $120 \pi$  ohms) at the referenced coordinates, may be examined to determine extent of possible interference. Depending on the theoretical field strength value and existing root-sum-square or other ambient radio field signal levels at the indicated coordinates, a clause protecting the monitoring station may be added to the station authorization.*

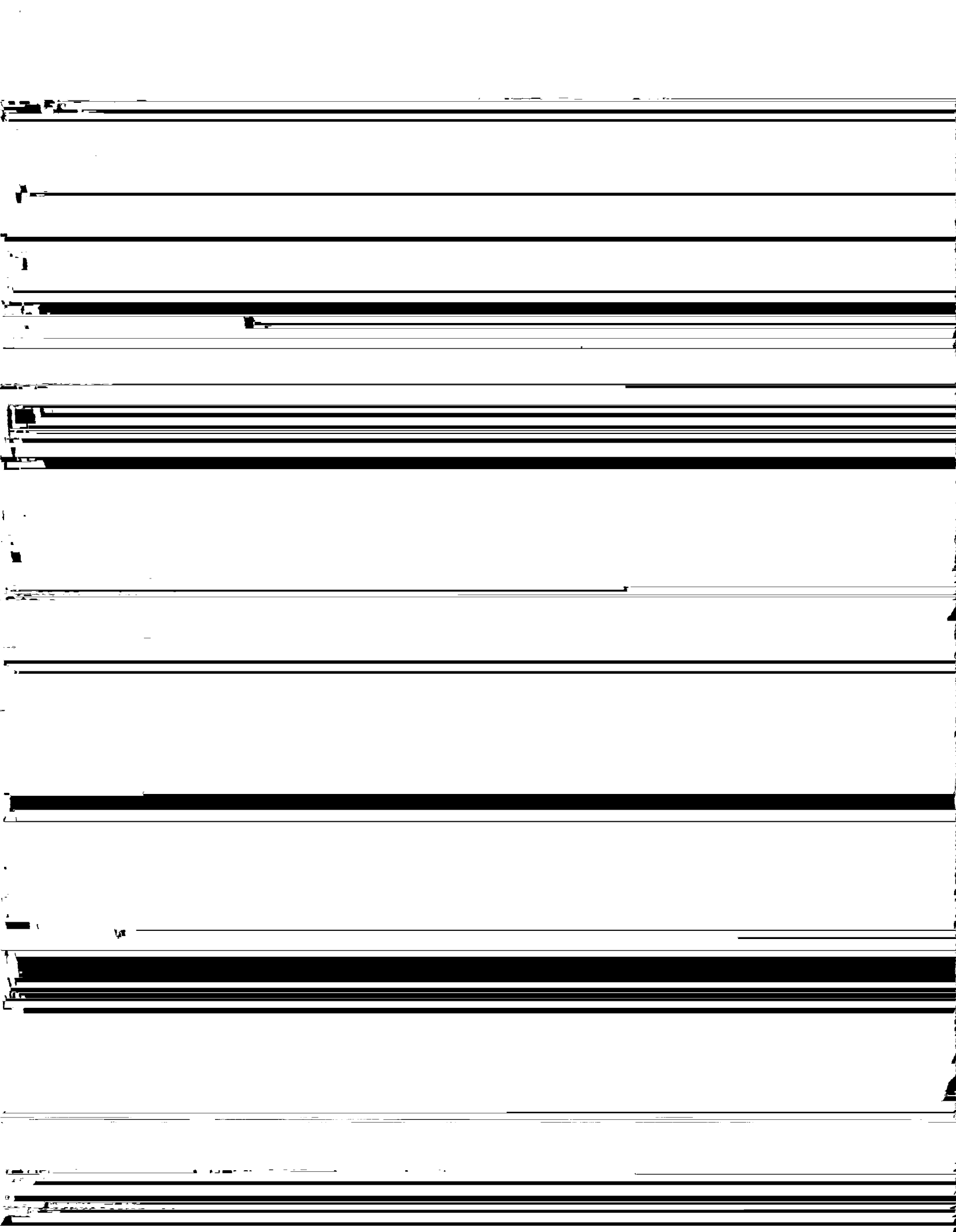
- (2) *In the event that calculated value of expected field exceeds 10 mV/m (-65.8 dBW/m<sup>2</sup>) at the reference coordinates, or if there is any question whether field strength levels might exceed the threshold value, advance consultation with the FCC to discuss any protection necessary should be considered. Prospective applicants may communicate with: Chief, Field Operations Bureau, Federal Communications Commission, Washington, D.C. 20554, Telephone (202) 632-6980.*
- (3) *Advance consultation is suggested particularly for those applicants who have no reliable data which indicates whether the field strength or power flux density figure indicated would be exceeded by their proposed radio facilities (except mobile stations). In such instances, the*

The predicted field based upon the FCC F(50,50) propagation curve is 92.7 dBu for visual carrier and 82.7 dBu for aural carrier. Even on this basis, the FJB proposal exceeds the FCC limit. See Table 1 which details the calculations based upon the FCC F(50,50) propagation curve for the present WMAR-TV operation and the proposed FJB operation. As seen from these calculations, FJB will increase the Channel 2 field by 7.9 dBu. The aural field would increase from 74.8 dBu to 82.7 dBu, exceeding the 10 mV/m (80 dBu) limit for the first time. It is further noted that the Rule clearly states that the calculation be performed using the **direct wave** and those calculations then become 103.5 dBu for visual carrier and 93.5 dBu for aural carrier.

Therefore, FJB exceeds the 10 mV/m direct wave criteria and it fails to demonstrate how it intends to comply.

The FJB calculation methodology cannot be in accordance with Section 73.1030 of the FCC Rules. This is further revealed in its determination that ... "The calculation of WPOC(FM), as discussed in the original application will result in a predicted decrease in the WPOC(FM) predicted field at the monitoring station from 83.98 dBu to 83.92 dBu." WPOC(FM) is a Class B station entitled to operate with maximum facilities for its class. Since WPOC(FM) established its current facilities prior to the metric conversion, it operates with an equivalent to 50 kW and 500 feet height above average terrain. Attached hereto is Table II which sets forth the







Item Three - **Other** -FJB takes issue with one of the assumptions that two transmission lines would be employed. In fact, FJB provides little information on how it proposes to operate. For example, one reason to employ two transmission lines is to have redundancy in the event of a failure of one of the lines, to permit continued operation. FJB does not disclose if it contemplates having a licensed auxiliary operation. This would be desirable in the event of the failure of its proposed single transmission line. WMAR-TV has a fully redundant auxiliary operation including transmitter, transmission line and antenna as would be expected for a market of the size of Baltimore.

#### **Operation During Outages**

FJB stated in its application its intent to install auxiliary power systems. However, FJB did not propose any standby system to cover outage situations such as:

- ° STL System
- ° Transmitter
- ° Transmission Line
- ° Antenna

FJB states that the transmitter site would be equipped with a backup generator to power the transmitter and associated equipment while the main studio generator would be of sufficient power to operate a console and other equipment necessary for station operation.

In the event of a failure of the STL system, the transmitter, the transmission line, or the antenna, FJB service to the public will cease.

The Scripps Howard operation of WMAR-TV currently includes the following:

1. A 400 KVA auxiliary power unit is maintained that will feed the entire studio.
2. A 185 KVA generator is maintained that will feed the entire transmitting plant of WMAR-TV.
3. Redundant STL system (transmit and receive).
4. A standby full-power television transmitter is maintained on site. This transmitter is a self redundant parallel transmitter which can operate at full power or with either single transmitter at one-half power. In addition, the main transmitter features dual exciters.
5. WMAR-TV maintains a spare 3.5 inch transmission line.
6. WMAR-TV maintains a spare antenna located underneath the candelabra portion of the tower with an antenna height above average terrain of 276 meters at approximately 1/3 of licensed ERP.

From the system described above, the current Scripps Howard operation of WMAR-TV provides continuous full television studio and transmission service to Baltimore under major emergencies or equipment breakdowns.

TABLE I

FCC MONITORING STATION PROTECTION  
LAUREL, MARYLAND  
FEBRUARY 1992

**SUBJECT:** Predicted Channel 2 television field strength values at the protected FCC field office at Laurel, Maryland.

WMAR Licensed Channel 2 Site

FCC Field Office Site

N 39° 20' 05" - W 76° 39' 03" to N 39° 09' 54" - W 76° 49' 17"  
per §0.121(c) of the FCC Rules

WMAR to Field Office: 23.91 km, N 217.9°E

Predicted F(50,50) Field at 23.91 km: 84.8 dBu (visual)  
and 74.8 dBu (aural)

Four Jacks Broadcasting, Inc. Proposed Channel 2 Operation:

FJB Coordinates

to

FCC Monitoring Station

N 39° 17' 13" - W 76° 45' 16" N 39° 09' 54" - W 76° 49' 17"  
per §0.121(c) of the FCC Rules

Four Jacks Site to Field Office: 14.72 km, N 203.1°E

Predicted F(50,50) Field at 14.72 km: 92.7 dBu (visual)  
and 82.7 dBu (aural)

- ° Based on FCC curves, a predicted increase of 7.9 dB visual signal in predicted field strength will occur at the Commission protected Laurel, Maryland monitoring station
- ° Based on FCC curves, the Channel 2 aural signal will increase from 74.8 dBu to 82.7 dBu, exceeding the 10 mV/m (80 dBu) limit.

TABLE II  
FCC MONITORING STATION PROTECTION  
LAUREL, MARYLAND  
FEBRUARY 1992

Predicted WPOC(FM) 16 kW (licensed) and 21 kW (proposed) field strength values at the protected FCC field office at Laurel, Maryland, per Section 73.1030(c) of the FCC Rules. The proposed 21 kW WPOC(FM) operation would be necessitated by Four Jacks Broadcasting, Inc. proposed Channel 2 operation.

<u>WPOC(FM) Coordinates</u>	to	<u>FCC Monitoring Station</u>
N 39° 17' 13" - W 76° 45' 16"		N 39° 09' 54" - W 76° 49' 17" per §0.121(c) of the FCC Rules
WPOC(FM) Site to Field Office:		14.72 km, N 203.1°E
Predicted Unattenuated or "Direct-Wave" fundamental field:		95.2 dBu (60 mV/m) licensed 96.8 dBu (69 mV/m) proposed

COHEN, DIPPELL AND EVERIST, P. C.

## TABLE III

ALL OTHER LICENSEES  
LOCATED AT THE FOUR JACKS BROADCASTING, INC. SITE  
N 39° 17' 13" - W 76° 45' 16"  
AT OR ABOVE THE 550 FOOT ABOVE GROUND LEVEL  
NOT CONSIDERED BY FOUR JACKS BROADCASTING, INC.  
AS REQUESTED BY QUESTION 14 OF FCC FORM 301  
FEBRUARY 1992

### NUMBER OF LICENSEES OPERATING

COHEN, DIPPELL AND EVERIST, P. C.

**TABLE IV**

**PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39° 17' 13" - W 76° 45' 16"**

**FEBRUARY 1992**



COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

Page No. 1

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME			LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY	ST	ZIP	ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT							
KNEA347	YX	852.5375	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	856.5125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	860.5125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	858.5125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	859.5125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	854.8625	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							
KNEA347	YX	854.7125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	772	FB2C							

COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

Page No. 2

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME			LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY	ST	ZIP	ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT							

## COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

Page No. 3

PART 90 SERVICES  
 LOCATED AT SITE PROPOSED  
 BY FOUR JACKS BROADCASTING, INC.  
 N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME	ST	ZIP	LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY			ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT							
KNEA347	YX	858.0375	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	857.0375	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	853.2375	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	859.0625	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	100.00000	540	550	772	FB2C						
KNEA347	YX	856.0375	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	860.0625	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	100.00000	540	550	772	FB2C						
KNEA347	YX	865.6125	AMK COMMUNICATIONS INC			39	17	13	76	45	16

COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

Page No. 4

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME	ST	ZIP	LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY			ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT							
KNEA347	YX	862.6125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	863.6125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
KNEA347	YX	864.6125	AMK COMMUNICATIONS INC			39	17	13	76	45	16
13212 BEALL CREEK CT			POTOMAC	MD	208540000	ANDREW DASKALAKIS			3019637092		
70.00000	1.00000	540	550	772	FB2C						
WKNJ330	GB	854.6375	BROWNING FERRIS INDUSTRIES			39	17	13	76	45	16
7521 CEMETARY LN			ELKRIDGE	MD	212270000				3017997822		
70.00000	155.00000	540	550	762	FB2						
WNKM905	YS	935.2625	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON	TX	772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.2750	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON	TX	772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.2875	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON	TX	772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						

COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

Page No. 5

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME	ST	ZIP	LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY			ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT							
WNKM905	YS	935.3000	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3125	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3250	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3375	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3500	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3625	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						
WNKM905	YS	935.3750	C & E INCORPORATED			39	17	13	76	45	16
POB 691054			HOUSTON		TX 772691054				7138944800		
150.00000	350.00000	540	550	772	FB2C						

TABLE IV

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

PART 90 SERVICES  
LOCATED AT SITE PROPOSED  
BY FOUR JACKS BROADCASTING, INC.  
N 39-17-13 W 76-45-16

CALLSIGN	RADIO_SRVS	FREQUENCY	LIC_NAME			LAT-DEG	LAT-MIN	LAT-SEC	LON-DEG	LON-MIN	LON_SEC
STREET ADDRESS			CITY			ATTENTION			PHONE		
PWR-OUT	ERP	GND-ELE	ANT-HGT	HAAT	ST	ZIP					
-----											
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	937.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	897.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	898.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
150.00000	350.00000	540	550	772	FB2						
WNNJ721	GU	937.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
150.00000	350.00000	540	550	772	FB2						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
WNNJ721	GU	936.1625	CARL MESSENGER INC			39	17	13	76	45	16
829 W BALTIMORE ST			BALTIMORE		MD	212010000	CARL PARR JR		3015987100		
30.00000	35.00000	540	550	772	MO						
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COHEN, DIPPELL AND EVERIST, P.C.

TABLE IV

PART 90 SERVICES

Page No. 8

FOOTNOTES TO PART 90 SERVICES



**COHEN, DIPPELL AND EVERIST, P.C.**

TABLE IV

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**PART 90 SERVICES  
LOCATED AT SITE PROPOSED**